



STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

*WRITTEN TESTIMONY PRESENTED BEFORE THE
Government Administration and Elections Committee*
In Support of S.B. No. 342
(An Act Concerning the Electronic Filing of Campaign Reports)

March 7, 2016

Statement of Michael J. Brandi, Executive Director & General Counsel
State Elections Enforcement Commission

Chairman Cassano and Chairman Jutila, Vice Chairs Gerratana and Alexander, Ranking Members Senator McLachlan and Representative Smith, and distinguished Committee members. I am Michael Brandi, the Executive Director & General Counsel of the State Elections Enforcement Commission.

I am here to speak in favor of Raised Bill No. 342. I would like to point out that this is a bill that would save the State money, as well as improve timely disclosure of campaign finance reports.

The bill requires electronic filing (e-filing) for all committees that raise or spend in excess of \$1,000 and who file with SEEC. Currently, e-filing is required only for committees of statewide candidates that spend over \$250,000. This change will affect all CEP candidate committees who receive grants as well as approximately 50% of other political and party committees who now file with SEEC on paper.

Specifically, this bill lowers from \$250,000 to \$1,000 the threshold for the mandatory e-filing and makes it applicable to all candidate committees or exploratory committees for General Assembly, statewide office, and Judge of Probate, as well as town committees and other political committees required to file with the SEEC beginning with the July 2017 quarterly filing.

For such committees that continue to file on paper, the bill takes into account situations where treasurers make arrangements with a commercial delivery service for a campaign finance disclosure statement to be delivered by a specified time, or mail such a statement several business days prior to

the deadline and obtain a receipt from the United States Postal Service indicating the date the statement was mailed, yet for some reason the statement is not received by the Commission until after the deadline. This proposal gives the Commission reasonable discretion to not subject such treasurers and committees to late filing fees when there is hard evidence that the filing should reasonably have been delivered and received by the filing deadline. The bill also permits the Commission to waive the mandatory electronic filing requirement upon the request of a treasurer, if good cause is shown. It takes into account, for example, that there are some treasurers without access to a home computer and for whom electronic filing may not be a viable option.

SEEC's electronic Campaign Reporting Information System ("eCRIS") is a state of the art system which is already built and completely scalable for this task. Mandatory e-filing will substantially help to effectuate transparency in political campaign funding. Mandatory e-filing will secure Connecticut's position as a national leader in campaign finance disclosure.

Additionally, this bill signifies substantial cost savings for the State. When filings are made on paper, SEEC pays for them to be data entered, and this costs approximately \$42 per filing. We spend tens of thousands of dollars each year on these filings, and those costs would be greatly reduced if this legislation were to pass. If SEEC eventually becomes the filing repository for all municipal offices the savings would only increase.

This bill makes sense fiscally for the State and improves disclosure for the public.

The language proposed by our Commission has been changed, and many of the changes clarify the language in helpful ways so we thank the Committee and the LCO attorneys for this. There are, however, two minor tweaks I would like to suggest. First, in subsection (b) (3) of Section 1, we recommend adding the word "other" before "political committee" in line 39. This will make it crystal clear that legislative caucus committees and legislative leadership committees are covered by the requirements in subsection (b) (2) rather than those in subsection (b) (3) (lines 37-38).

Second, in this same subsection, I propose deleting "political committee or town committee" in lines 48-49. This language was added to our proposal and would have the effect of requiring political committees and town committees to refile all paper filings that they had ever done in the electronic filing format when they cross the threshold requiring them to e-file their first electronic

report. Because these committees, unlike the candidate committees we proposed this requirement for, typically have existed over many election cycles we believe it would be overly burdensome to require treasurers of such committees to go back and electronically report from dollar zero of their committee. If this Committee does want to expand this requirement to political and town committees, we suggest that you establish parameters such as refiling of paper statements made in the current election cycle.

Thank you for this opportunity to present this testimony.